

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

In re:

BMX TRANSPORT, LLC,

Debtor.

CASE NO. 25-20705-JRS

CHAPTER 11

**AMENDED EMERGENCY MOTION OF THE DEBTOR
FOR EXPEDITED HEARINGS ON FIRST DAY MOTIONS**

BMX Transport, LLC, (the “**Debtor**”) files this Emergency Motion for an expedited hearing on certain First Day Motions (defined below) pursuant to Rule 9006-2, Bankruptcy Local Rules for the Northern District of Georgia, respectfully showing the Court as follows:

1. On May 20, 2025 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. Since the filing, the Debtor has continued in possession of its properties and has operated and managed its affairs as debtor-in-possession pursuant to the provisions of Sections 1107 and 1108 of the Bankruptcy Code. No creditors’ committee, trustee, or examiner has been appointed in these cases.

2. On May 20, 2025, the Debtor filed a Motion for Authority to Use Cash Collateral [Doc. 2] (the “**Cash Collateral Motion**,”).

3. On May 20, 2025, the Debtor filed an Emergency Motion for Order Authorizing the Continued Use of Existing Bank Accounts [Doc. 3] (the “**Bank Account Motion**”).

4. On May 20, 2025, the Debtor filed an Emergency Motion for Order Authorizing Payment of Prepetition Employee Compensation in the Ordinary Course of Business [Doc. 4] (the “**Payroll Motion**”)

5. On May 20, 2025, the Debtor filed an Emergency Motion for Order Authorizing the Debtor to Maintain Insurance Policies, Pay All Policy Premiums Arising Thereunder, and Renew or Enter Into New Policies [Doc. 5] (the “**Insurance Motion**”)

6. On May 21, 2025, the Debtor filed an Emergency Motion for Entry of an Order Authorizing the Debtor to Pay Pre-Petition Taxes and Fees in the Ordinary Course of Business [Doc. 11] (the “**Tax Motion**” and collectively with the Cash Collateral Motion, the Bank Accounts Motion, the Payroll Motion and the Insurance Motion, the “**First Day Motions**”).

7. The First Day Motions should be heard on an expedited basis to enable the Debtor to maintain its existing bank account, to use cash collateral to pay expenses in the ordinary course of business, and to pay employees’ salaries and wages and related taxes and costs.

WHEREFORE, the Debtor respectfully requests that this Court schedule a hearing on the First Day Motions at its earliest opportunity and grant such other relief as is just and proper.

Dated: May 21, 2025

Respectfully submitted,

KECK LEGAL, LLC

/s/ Jonathan Clements

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Proposed Counsel for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading was filed using the Court's CM/ECF system, which generates an electronic service copy thereof to all parties registered to receive notices.

Dated: May 21, 2025

Respectfully Submitted,

KECK LEGAL, LLC

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